



Focus

Stormwater Pollution Prevention Project – Final Report

INTRODUCTION

The origin of the Stormwater Pollution Prevention Project was in response to a request from the Independent Business Association (IBA). Due to the success of past technical assistance outreach projects conducted by Ecology's Hazardous Waste & Toxics Reduction (HWTR) Program for hazardous waste generators, the IBA requested similar assistance for businesses in regard to stormwater pollution. In discussions with Representative Chandler and the IBA, an arrangement was made for the HWTR Program to develop and carry out a stormwater P2 project designed to provide pollution prevention assistance to businesses with a focus on stormwater. These efforts were largely funded by the Hazardous Waste Assistance Account. The project ran for one year between September 1997 and September 1998.

OBJECTIVE

The focus of this project was to increase businesses awareness of on site sources that could contaminate stormwater being discharged from their property to surface waters or into storm drainage systems that lead to surface waters. The site visits also helped determine if a site needed a stormwater permit or if certain Best Management Practices (BMP) could be implemented by the business to eliminate the need for a stormwater permit.

METHOD

To achieve the objectives of this project, the HWTR Program provided training, via the Water Quality Program's Stormwater Unit, for Regional and Headquarter hazardous waste staff on stormwater issues. This training covered issues such as stormwater rules and permit requirements, what to look for during a site visit, problems associated with stormwater runoff, explanations of what the stormwater program refers to as category 1 – 11 industries, and common BMPs that can reduce or eliminate contamination of stormwater. The training occurred during the last three weeks in September, 1997, at each Regional office and at the HQ office. The site visits began shortly afterwards, although the NWRO and the ERO began their visits in January 1998. The site visits were primarily focused on businesses impacted by the Industrial Stormwater Permit Program, both those that could possibly terminate their permits if they implemented a prescribed set of BMPs and those that must follow permit requirements but needed technical assistance.

DISCUSSION

Stormwater is water from precipitation that flows across the ground and pavement when it rains or when snow and ice melt. Any business whose activity falls within a specific set of Standard Industrial Classification (SIC) codes and discharges stormwater either to surface water or to a storm sewer which leads to surface water is required to obtain a stormwater discharge permit.

The purpose of the stormwater pollution prevention project was to provide pollution prevention assistance to businesses with a focus on stormwater. The site visits were designed to be technical assistance visits rather than compliance inspections and usually took about one hour to complete. The site visits included a walk around the outside perimeter of a site, looking in areas where products and wastes are managed and handled and where exposure to the elements could cause a pollution problem. During each visit, HWTR staff delivered consistent BMPs to reduce the potential for contamination of stormwater and, possibly, to help a facility terminate their stormwater discharge permit. The Water Quality Program will act upon any notice of terminations (NOTs) generated as a result of this project and will work with the business in evaluating the NOT request.

Under Ecology's Stormwater Program, businesses that must apply for a stormwater permit are divided into eleven categories: categories 1 – 11. The eleven categories are a convenient way the Federal EPA lumps groups of industries that have similar requirements under a stormwater permit. Industries are assigned to categories based on their SIC code and by narrative description. Although not exclusive, the site visits generally targeted category 11 businesses (light manufacturing facilities). Category 11 businesses are unique because industries listed in that category must have coverage under the stormwater permit only if their on site activities or materials are exposed to stormwater. In other words, it may be possible for some category 11 businesses to eliminate the need for or terminate their stormwater permit if site specific BMPs are implemented.

RESULTS AND CONCLUSION

Attached are the results of the Stormwater Pollution Prevention Project. Overall, the stormwater pollution prevention project was successful in meeting its objectives. That is, the field staff helped 185 businesses become more aware of stormwater activities on their sites and showed them how to keep their stormwater from becoming contaminated. Some of the results included.

- ✓ Approximately one third of the sites either did not need a permit, or if certain BMPs could be implemented, might have an opportunity to terminate their stormwater permit. However, so far only two Notice of Terminations (NOTs) have been submitted to Ecology. (Any determination to terminate a stormwater permit would be administered through the Water Quality Program.)
- ✓ While 60% of the light manufacturing businesses (Category 11 facilities) had developed a pollution prevention plan, only approximately 4% of Category 6 sites (predominately auto recyclers) and 2 of the 3 Category 2 sites did the same.

- ✓ Most of the facilities (129 out of 185) discharged stormwater to surface water or to a drainage system leading to surface water.

The majority of BMPs offered to Category 11 sites centered around “house cleaning” activities. For the most part the field staff were welcomed onsite and their advice appreciated. The following data describes in more detail the findings of the project by business category.

STORMWATER POLLUTION PREVENTION FINDINGS

September 1998

TOTAL NUMBERS AND DISTRIBUTION OF VISITS

- ❖ 185 technical assistance visits were completed.
- ❖ 39 of those visits were completed by the CRO
- ❖ 71 by the SWRO
- ❖ 66 by the NWRO
- ❖ 6 by the ERO
- ❖ 3 by the HW Permit Section
- ❖ 4 sites, no one around, not enough data to add to the 185 sites

Category 11 Sites (Light Manufacturing Facilities):

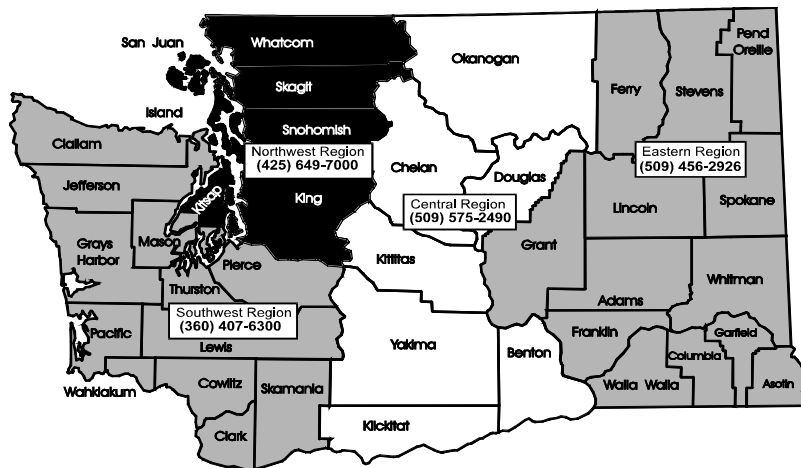
- ❖ 147 out of the 185 sites were Category 11 sites.
- ❖ 89 sites had developed a pollution prevention plan
- ❖ 123 sites had a surface water discharge (one under an NPDES permit) or discharged to a drainage system leading to surface water
- ❖ 18 sites also discharged stormwater to groundwater
- ❖ 60 sites could implement BMPs to avoid requiring a permit or possibly may not need a permit
- ❖ 2 sites did not need a stormwater permit due to the NPDES permit
- ❖ One site without a stormwater permit was identified as needing one
- ❖ Two “NOTs” have been submitted
- ❖ Common observations noted among sites were covering up and/or bringing materials (products & wastes) indoors. Recommendations were to provide secondary containment, develop a schedule to regularly inspect and clean out storm drain catches. Also, a common note made was to have wastes being stored outside removed from on-site. Put up baffles around drains, keep dumpsters closed, cover load/unloading areas, clean up yard, and have waste picked up more often.

Category 6 Sites (Autorecyclers, TSD):

- ❖ 35 of the 185 sites were Category 6 sites
- ❖ 32 were auto recyclers, one was a fuel blender, one a TSD, and one a DW recycler
- ❖ 4 sites had developed a pollution prevention plan
- ❖ 5 sites had a surface water discharge
- ❖ 32 sites discharged stormwater to groundwater
- ❖ BMPs included: discussing dangerous waste management, the need to drain liquids out of vehicles when they come on site and to store those liquids in closed labeled containers, use of drip pans, and general stormwater BMPs.

Category 2 Sites (Heavy Manufacturing Facilities):

- ❖ 3 of the 184 sites were Category 2 sites
- ❖ 2 sites had developed a stormwater pollution prevention plan
- ❖ One site discharged stormwater to surface water
- ❖ 2 sites discharged stormwater to groundwater
- ❖ Common BMPs included: General cleaning up yard.



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